## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF OKLAHOMA

THE CHICKASAW NATION and	)
THE CHOCTAW NATION,	)
Plaintiffs,	)
V.	) No.: 05-01524-W
UNITED STATES DEPARTMENT OF THE INTERIOR, et al.,	) Senior Judge Lee West
Defendants.	) ) )

## PLAINTIFFS' CROSS-MOTION REQUESTING FORMAL MEDIATION SESSION IN WHICH ALL PARTIES ARE PRESENT WITH FULL SETTLEMENT AUTHORITY IN COMPLIANCE WITH LOCAL RULE 16.3 AND REQUEST FOR EXPEDITED HEARING

Pursuant to the Court's July 28, 2014 Order appointing Special Master Robertson, and Local Rule 16.3, Plaintiffs, the Chickasaw Nation and the Choctaw Nation (the "Nations"), respectfully cross-move this Court to order the parties in this litigation, the Nations and Defendants, United States Department of Interior, *et al.*, to attend a formal mediation session in which all parties are present with full settlement authority. Further, given the February 12, 2015 deposition date for the Secretary of Interior, and its relation to the issues in this Cross-Motion, the Nations respectfully request the Court set this Cross-Motion for expedited hearing.

In support of this Cross-Motion, Plaintiffs submit this Cross-Motion, and a Memorandum of Points and Authorities in support thereof, which has been combined

with Plaintiffs' Response to Defendants' Motion for Protective Order Quashing Notice of Deposition of Secretary of the Interior S.M.R. Jewell, pursuant to Local Rule 7.1(c). DATED this 5th day of February 2015.

Respectfully submitted,

/s/ Michael Burrage

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## **CERTIFICATE OF SERVICE**

I hereby certify that I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system, which will send email notification of such filing to all registered parties.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: February 5, 2015.

/s/ Michael Burrage Michael Burrage